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ABSTRACT

Encountering an aggressive student press can be an intimidating and frustrating experience for an administrator. By understanding the rights and responsibilities of a college newspaper staff, administrators can improve their relationships with the press, as well as benefit themselves by using the newspaper to inform campus groups of important information. Although student newspapers are often associated with schools or departments of journalism and have faculty or staff advisors, the advisor has no editorial control or censorship rights. Administrators, however, can use letters to the editor expressing opinions or concerns about campus issues to gain access to the student newspaper. In addition, when mistakes appear in the student newspaper, the administrator should contact the editor or managing editor. Most student newspapers will publish a correction in the next edition, and some will even publish clarifications of previously published stories. Freedom of information laws and legal precedents set in the United States Supreme Court's decision in the case of "Hazelwood School District v Kuhlmeier" and other cases illustrate that school authorities may not censor content, withdraw financial support, or fire editors over disagreements in viewpoint if the newspaper is legally considered a "forum for student expression" or a "public forum." It is important for administrators to understand the areas of the student press that can be regulated or censored if there is a threat of substantial disruption of the educational environment or liability. (Nineteen notes are included and 12 references are attached.) (PRA)

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The Administrator and the College Press: Strategies for a Successful Relationship

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Abstract

Encountering an aggressive student press can be an intimidating and frustrating experience for an administrator. The strategies that lead to a successful relationship with the collegiate press include understanding the structure, legal rights, and responsibilities of the student newspaper. The U.S. Supreme Court's decision in the Hazelwood case, as well as other legal implications with suggestions for improving relationships with the college press are explored.

Encountering an aggressive student press can be an intimidating and frustrating experience for a higher education administrator. An aggressive student journalist often will ask questions the administrator does not want to answer. And the student press may exert pressure by using freedom of information laws to gain material it wants. Unfortunately, many administrators respond to such actions by attempting to censor the student press or to illegally deny it information to which the public is entitled.

However, by understanding the rights and responsibilities of a college newspaper staff, administrators can improve their relationships with the press, as well as benefit themselves by using the newspaper to inform campus groups of important information.

Structure of the college press

Courts have found that freedom of speech and freedom of the press as guaranteed under the First Amendment apply not only to newspapers in the public sector but also to college newspapers. The importance of protecting free speech and a free press was perhaps best articulated by Supreme Court Justice Oliver Wendell Holmes who said the First Amendment is a "protector of truth" which can evolve only from "free, robust, uninhibited communication in the public marketplace of ideas." The atmosphere of a college or university is the ideal setting for bringing forth these ideas for public scrutiny and debate.

Unfortunately, however, administrators often perceive the collegiate press as a threat to the status quo. Views expressed in the campus newspaper often create discomfort. However, the student newspaper can serve as a vital tool in the expression and communication of ideas at the institution. The wise administrator will understand the role of the student press and encourage its function within the free press system.

A student newspaper may have various organizational forms. However, most student newspapers have similar internal structures. In addition, the student newspaper may be found in any of several areas of the institution.

Approximately a third of the college newspapers throughout the country are associated with schools or departments of journalism.[1] In this environment, the student paper is used as a laboratory teaching tool for students enrolled in reporting or editing courses. There are other students who serve as staff members, writing and editing along with students enrolled in courses. The editor usually retains full editorial control over the content of the newspaper. There may be a

faculty or staff adviser who provides advice or information for the staff, but the adviser has no editorial control or censorship rights.

Another third of the college newspapers are situated in the student services area. A dean of students or a director of student activities may function in an advisory capacity, again with no direct control over the content in the paper.

Approximately 12 percent of the student newspapers are independent; that is, they are not affiliated with or housed under any area of the college or university. These papers may or may not have editorial offices on campus; however, they are considered the "official" student newspaper.

The remaining student newspapers may be housed in the president's office, the public relations office, or within a particular college. These papers very often are not aggressive in their coverage of issues for obvious reasons.[2] The fear of angering the administration causes these papers often to be mere public relations pieces for the administration.

Areas of the student newspaper

The three main areas of the student newspaper are news and editorial, advertising, and production. Each area is overseen by a student editor or a staff member, as in advertising or production.

The news area of a paper includes all news, feature, or sports stories. The function of the news area is to provide information, present ideas and issues and entertain readers. Content may include general information stories of upcoming events, or in-depth articles about issues or areas of the institution. The editor or managing editor assumes the task of making story assignments to reporters. Reporters then gather the information and write the stories.

The purpose of the editorial page is to bring forth issues and ideas for discussion or debate. The editorial or opinion page of the student newspaper usually is written by the editor or the managing editor. The editorial page will contain articles of opinion, including editorials which may or may not contain the author's name, columns, reviews, or other opinion pieces that contain the beliefs or attitudes of the writer. Most student newspapers accept letters-to-the-editor and publish these letters on the editorial page, thus allowing the reader to voice his or her opinion, in support or opposition. Letters-to-the-editor can allow the administrator to gain access to the student newspaper. Administrators may wish to write letters to the editor expressing opinions or concerns about campus issues.

The advertising area includes any paid advertisements for goods or services. Ads usually are

found at the bottom of the pages in the newspaper and are distinguishable by borders or boxes. Businesses, campus groups and individuals pay for their information to appear in this space. Advertising rates, or the cost to the advertiser for a particular amount of space, is determined by the advertising manager, business manager, or adviser. Most student newspapers employ a full-time advertising or business manager to oversee the advertising area.

The production area of a student newspaper actually produces the pages for printing. Depending on the size of the staff and the sophistication of the equipment, the production area can produce camera-ready pages for printing. Smaller student newspapers may do part or all of the production of the pages, with the remainder done by a professional printer. This task is accomplished by the use of computer typesetting equipment and other printing techniques. Most large schools do prepare camera-ready pages that are then sent to a commercial printer. When the operation is large, the newspaper may employ a staff member to serve as production manager.

Roles of the staff members

The editor of the student paper should, and usually does, maintain editorial control over the content in the student newspaper. This means the editor has the final word in the use of any news story or editorial appearing in the paper.

This arrangement puts the student editor in a very powerful position with regard to content and direction of the paper. He or she may choose what articles or opinion pieces will appear in the paper. However, editors also rely on sub-editors to make decisions for various parts of the paper. For example, the sports editor will oversee the sports pages or section. A fine arts or entertainment editor will make decisions in that area.

The editorial page, however, generally remains under the direct control or influence of the student editor. He or she will decide the editorials and opinion pieces to be written, as well as the position the newspaper will take on each issue. Occasionally, an editorial page editor will edit the copy on the page. He or she may write editorials and opinion pieces but will answer directly to the student editor. Often, the student newspaper editor will have an editorial board made of sub-editors, and perhaps the adviser or a faculty member. These boards will meet on a regular basis to discuss issues important to the institution and its students. They also will debate the editorial position the newspaper may take on a controversial issue. However, editorial boards act in an advisory role to the editor, who makes the final decisions about editorials and page content.

Sub-editors are responsible for various areas in the newspaper, such as news, sports, entertainment, or feature stories. These editors may be responsible for making story assignments in their particular areas, as well as for editing the pages that contain articles in their area.

Reporters gather the information for a story and write it. Papers with large staffs usually have "beat" reporters assigned to cover information from a particular area of the institution, such as student activities, academic affairs, or a particular academic or support department. These reporters are responsible for maintaining contact with the story sources on their "beat" -- administrators, staff members, or faculty members -- who will provide them with information pertinent to the university community. Under this system, the administrator has a constant link through that beat reporter to the student newspaper.

Smaller papers have general assignment reporters who cover stories at the request of an editor. These reporters may cover stories from any part of the institution at any time.

Copyeditors edit the reporters' stories for mistakes, errors and insufficient information. They may decide to remove portions of the story or change the wording or structure of the reporter's story. Copyeditors also design the pages and decide story placement. They write the headlines and caption information underneath photographs.

The adviser of the newspaper functions in a teaching and advisory capacity. He or she provides information and advice to students in all areas of the paper. He or she may make story or editorial suggestions but has no legal right to censor articles or editorials, unless he or she deems the information to be of libelous nature. Even in this instance, legal restrictions apply on holding material the adviser finds libelous.

Most student newspapers have an advisory board, sometimes called a publications board. The composition of these boards varies; however, they usually are composed of newspaper staff members, the adviser, a representative of student government, and one or more faculty members. These boards act in an advisory capacity, often assisting in the selection of editors, or arbitrating disputes between the newspaper and other campus organizations. These publications boards should have their own published guidelines outlining the limits of their authority. They do not have any legal right to dictate or censor content of the student newspaper.

When the student newspaper is affiliated with a school or department of journalism or an English department, professors act as instructors in the various areas of writing and editing. Again, these faculty members have no legal authority over the content of the student newspaper.

When mistakes appear in the student newspaper, the administrator should contact the editor or managing editor. Most student newspapers have a corrections policy that states the paper will publish a correction in the next edition. In addition, some papers will publish clarifications of stories previously published.

Legal rights of the student newspaper

Instances of prior restraint, censorship, dismissal of editors, and removal of funding occur each year at both public and private colleges. Many of these cases would not come about if administrators understood the basic laws of press freedom pertaining to student newspapers. The Student Press Law Center in Washington, D.C., provides legal advice and assistance to administrators, student journalists and faculty advisers who experience censorship or other legal problems. Also, many state press organizations will answer legal questions and provide assistance.

But how far can an administrator go without infringing on the legal rights of the student press? Many believe censorship efforts by college administrators are on the rise. Edmund Sullivan, director of the prestigious national Columbia Scholastic Press Association, is fearful of the potential implications for the collegiate press from the January 1988 Supreme Court decision in the Hazelwood case. "I believe personally, it would be possible for the courts to restructure the college press (in view of Hazelwood)," Sullivan says. "All it would take is an associate dean or student government representative who is unhappy with their coverage in the collegiate press to push it."

But just how far can collegiate administrators "push" the censorship issues brought forth in Hazelwood into the arena of the college press? To answer this, one must review the important issues in Hazelwood.

Overview of Hazelwood

The case of Hazelwood School District v Kuhlmeier (484 US --, 98 L Ed. 2d 592, 108 S Ct --) involved a publication called the Spectrum produced every few weeks by journalism students at Hazelwood East High School near St. Louis. In May 1983, Principal Robert Reynolds ordered two articles deleted from the paper. One featured experiences of three Hazelwood students who had become pregnant; the other dealt with the impact of parental divorce on students. Although the first article used pseudonyms, the principal believed the students in the story were identifiable. He also

considered the article too frank for younger students, explaining that its overall picture of teen-age pregnancy was too positive. The article concerning divorce did not represent the father's viewpoint, according to Reynolds.[3]

Three students who worked on the Spectrum brought suit, alleging a violation of their First Amendment right to free expression. Following district and appeals courts' verdicts, the case was brought before the United States Supreme Court. The Supreme Court agreed to hear the case and focus on two issues: 1. Is a school-sponsored newspaper, produced and published by a journalism class as a part of school-adopted curriculum, a "public forum" for the purposes of the First Amendment? 2. May school authorities act to prevent invasions of the rights of others by the school-sponsored newspaper only when failure to do so would subject the school to liability? The answer to both questions, according to the Supreme Court, was "no."[4]

The Court described the following criteria that it might look to for determining if a publication is school-sponsored: 1. Is it supervised by a faculty member? 2. Was the publication designed to impart particular knowledge or skills to student participants and audiences? and 3. Does the publication use the school's name or resources?[5]

According to some authors, the first two criteria appear to be most important. A public forum then is created when school officials have "by policy or practice" opened a publication for unrestricted use by students. In the Hazelwwod case, the Court said it was clear the adviser had final authority over almost every aspect of the publication, including its content.

Finally, the Court said in the case of censorship by school officials in a non-forum, school-sponsored activity such as a student newspaper, a different test would apply. When a school's decision to censor is "reasonably related to legitimate pedagogical concerns," such censorship will be permissible. In other words, if a school official can present a reasonable educational justification for censorship, that censorship will be allowed.

The Collegiate Press and the Forum Theory

It is important to note that in a footnote to its decision, the Court said, "We need not now decide whether the same degree of deference (to content decisions by school officials) is appropriate with respect to school-sponsored expressive activities at the college and university level." This is seen by some as the Court's leaving entact the numerous court decisions from around the country that protect the free press rights of college journalists.

Prior to Hazelwood, courts had seemed particularly sensitive to the rights of the student press to hold views characterized by many as extremist, unpatriotic, antiwar, or antiestablishmentarian. Also, courts had upheld the college student presses' right to criticize political officials, as well as school and college officials and their policies. Although criticism that was found to be gross, or unnecessary in disrespect was less protected.[6]

Campus newspapers are unique in their First Amendment right of free speech and free press.

The less control exercised by university officials in the editorial and other decisions of a campus newspaper, the more likely that a court will find no involvement by the institution and therefore no violation of Constitutionally protected rights, according to Mary Elizabeth Kurz, general counsel and vice president for legal affairs at Michigan State University.[7]

The values of the First Amendment require the state, under certain circumstances, to provide the public with access to facilities for speech. Conversely, such expression on government property may interfere with other activities for which the property is used. A balancing test therefore has been developed by the courts to resolve competing interests in the use of state facilities. That test is known as the forum theory. Forum theory holds that once the government creates a "forum" for public debate and expression of views out of public property, it may not censor expression taking place within that forum.[8] This is perhaps the most critical issue raised by the Hazelwood case.

Exactly how can the public forum theory operate in the context of the college newspaper? Is the college student newspaper a public forum for expression and therefore immune to censorship by administrators who disagree with or object to the content? Are the grounds the Supreme Court cites relative to the forum theory applicable to the collegiate press?

Courts have recognized that an official school newspaper is a "forum for student expression" entitled to the protection of the First Amendment if it is something more than a "time and activity sheet" as found in Zucker v Panitz, 299 F.Supp. 102, S.D.N.Y. 1969. Therefore, a publication is a forum if it: 1. publishes news, student editorials, and letters-to-the-editor; and 2. if it is distributed outside the classroom.[9]

However, fairly recent Supreme Court cases have further defined "forum" in three categories: 1. the quintessential public forum; 2. the limited public forum; and 3. the nonpublic forum. The student newspaper falls within the limited public forum category. To identify a limited public forum, the Court has "looked into the policy and practice of the government to ascertain whether it intended to [so] designate a place." (Widmar v Vincent, 454 U.S. 276, 267 n. 5, 1981.)

When determining the government's intent, the Court has focused on the nature of the property, in this case the newspaper, and its compatibility with expressive activity. Once the state has created a limited public forum, its ability to impose contraints on the expression taking place within that forum is quite restricted.

Although the Supreme Court has not yet addressed the question of whether a college newspaper is a public forum, other courts have suggested that a campus newspaper constitutes a limited public forum.[10] In Lee v Board of Regents of State College, (306 F.Supp. 1097, W.D. Wis., 1969) the court said, "As a campus newspaper, the Royal Purple constitutes an important forum for the dissemination of news and expression of opinion."

Censorship of Content

Other court cases have suggested that school authorities cannot censor content. In Bazaar v

Fortune (476 F.2d 570, 5th Cir., 1973) for example, the U.S. Court of Appeals for the Fifth District declared that officials at the University of Mississippi could not prohibit publication in the student literary magazine articles containing "earthy language" and a non-obscene depiction of interracial love. The Court said officials do not have the same powers as "private" publishers: "[T]here is a more basic reason why the University cannot be accorded the omnipotent position it seeks. The University here is clearly an arm of the state and this single fact will always distinguish it from the purely private publishers as far as censorship rights are concerned. It seems a well-established rule that once a university recognizes a student activity that has elements of free expression, it can act to censor that expression only if it acts consistent with First Amendment constitutional guarantees."[11]

Various other court decisions involving the censorship of official college publications have upheld the rights of student journalists to publish: a four-letter reference to the university president (Thonen v Jenkins, 517 F.2d 3, 4th Cir., 1975), a photograph of a burning American flag (Korn v Elkins, 317 F.Supp. 138, D.Md., 1970), an editorial calling for continued racial segregation of a university (Joyner v Whiting, 477 F.2d 456, 4th Cir., 1973), criticism of the governor and the state legislature (Dickey v Alabama State Board of Education, 273 F.Supp. 613, M.D.Ala., 1967), an article containing profanity by a non-student (Antonelli v Hammond, 308 F.Supp. 1329, D.Mass., 1970), and a scathing attack on the Catholic church (Panarella v Birenbaum, 327 N.Y.S. 2d 755, 1971).

Withdrawal of Financial Support

If a school-sponsored publication is a forum, school officials cannot withdraw or reduce funding merely because they object to the content of the publication. In Joyner v Whiting, the editor of the campus newspaper at a predominately black institution announced that the paper would not run "white advertising." The paper also published articles against integration attempts at the school. The paper was funded by a mandatory student fee and the president revoked the funds. The court ruled that although the school was an agency of the state, the state may not censor the student newspaper by withdrawing financial support or "asserting any other form of censorship oversight based on the institution's power of the purse."[12, 13]

A similar finding in Antonelli v Hammond held that a college president's power to distribute funds to campus organizations did not confer responsibility for what appeared in the campus newspaper. A more recent case (Stanley v MacGrath , 719 F.2d 279, 8th Cir., 1983) found that a university may not even replace a compulsory fee system for a student newspaper with a refundable fee system if it is done in retaliation for the content of the newspaper.

Dismissal of Editors

If a school-sponsored publication is a forum, then administrators cannot fire or suspend editors in disagreements over viewpoints expressed in the paper. The precedent-setting case in this

area is Schiff v Williams, 519 F.2d 257, 5th Cir., 1975. Claiming the student newspaper had deteriorated into a "smear sheet," the president of Florida Atlantic University fired three student editors. He also claimed the paper brought disrepute and embarrassment to the school.

The U.S. Supreme Court of Appeals for the Fifth Circuit, however, reinstated the editors stating that if the allegations were true, they were not "special circumstances" that would justify censorship of the student newspaper by dismissing the editors. The material cited by the president would not cause substantial disruption of the school, the court said. In addition, the president was ordered to pay monetary damages to the students for violating their First Amendment rights.

In another case, Thonen v Jenkins, both the editor and the author of a letter-to-the-editor critical of the school president, were expelled. The court ordered both reinstated. In the recent case involving the Dartmouth Review, a New Hampshire judge in January 1989 ordered Dartmouth College to reinstate two editors who had been suspended for harassment of a black faculty member when they sought a reply to an article criticizing his teaching. The judge said their dismissal had been tainted by bias against the off-campus weekly newspaper.

A similar outcome resulted from Trujillo v Love , 322 F.Supp. 1266, D. Colo., 1971. The court ordered the reinstatement of the managing editor of a state college's newspaper after the editor had been suspended for writing critical articles about the college president. The court said the state, having established the newspaper as a forum for student expression, may not then place limitations on the use of that forum which interfere with protected speech and which are not justified on the grounds that it is necessary to avoid material and substantial interference with school work or discipline. Furthermore, the court said that, "We appreciate that school officials have authority to prescribe and control conduct in the schools, but this authority must be exercised so as not to intrude upon fundamental Constitutional rights."[14]

Substantial Disruption

What are areas of the student press that can be regulated or censored if there is a threat of substantial disruption of the educational environment? In the precedent setting case, Tinker v Des Moines Independent Community School District, 393 US 503, 89 S Ct 733, 1969, the court said that students were free to express themselves so long as their speech or conduct did not interfere with the operation of the school or lead to "substantial disruption of or material interference with" school activities.

How can a student or administrator know that expression will be disruptive? The Tinker decision did not clearly answer the question, but it did provide a few guidelines. The court said that administrators must "be able to show [that their] action was caused by something more than a mere desire to avoid discomfort and unpleasantness that always accompany unpopular viewpoint."[15]

In Norton v Discipline Committee of East Tennessee State (90 S Ct. 2191, 1969), the dismissal of a group of university students for distributing literature critical of the administration was upheld. The court said the material was a vicious attack on the administration and was

calculated to bring ridicule and contempt and to damage the university's reputation. The court held the dismissals permissible because they said a university has the inherent authority to maintain order and to discipline students.

Courts have generally held that student publications that advocate conduct or actions likely to lead to violence or chaos may be regulated.[16]

Liability

Liability for the student newspaper often is the reason administrators cite as justification for regulation of the student press. The theory for placing liability on the institution is the theory of respondent superior, in which liability is based on a principal/agent relationship. However, where no right of control exists, there can be no agency relationship, according to Kurz.[17]

Milliner v Turner , 436 So.2d 1300, La. 1982, found that the university could not be held liable because it did not have the authority to control the content of the student newspaper. Faculty at the Southern University of New Orleans sued the school newspaper for libel after it called them "racists" and "proven fools." But the Louisiana Court of Appeals for the Fourth Circuit said, "We find the First Amendment of the United States Constitution would bar SUNO from exercising anything but advisory control over the paper, therefore exempting the university from liability or responsibility."

Prior Restraint

The question of whether or not administrators can read publications before they are printed or distributed at the school is troubling. This "prior review" occurs when an administrator requires a student to submit a publication for approval before the publication can be distributed.[18] Although the U.S. Supreme Court has never ruled whether or not such a practice is constitutional, it does seem that prior review in public colleges is not to be tolerated. A set of complicated requirements to give prior review have evolved form various court cases. These guidelines make it extremely difficult for an administrator to construct a system of prior review. In addition, no court has ever approved a specific set of publication guidelines allowing prior review. Journalism faculty members or student editors usually instruct reporters not to allow sources to read stories before they are published. Too often, allowing sources to read articles before publication leads to attempted prior restraint by administrators or other sources of information.

Freedom of Information

Freedom of information laws guarantee to news organizations the rights to certain information. The federal FOI Act provides access to all records of all federal agencies, unless these records fall within one of the nine categories in which agencies are permitted exemptions.[19]

Most states have open records or open meetings laws which allow access to information for legitimate purposes. In addition, federal and state privacy laws do put limitations on access to

information. Administrators should know and understand their own state laws before they encounter confrontations with the student press.

Conclusion

Until the Hazelwood decision, courts -- with fervor it seems -- have protected free speech rights of collegiate newspapers. However, the implications of Hazelwood for the college press may well rest on the forum theory and related cases. Furthermore, the issues of the age of students and non-compulsory attendance at the college level may work in favor of free press advocates. By the time most students attend college they have reached to age of "legal adulthood." Courts may determine these students are due substantially broader protection of their First Amendment rights than high school students.

In addition, the practice of non-compulsory attendance at institutions of higher education may constitute evidence that the college campus atmosphere affords the student more freedom than the high school environment. These issues may provide important distinctions for advocates hoping to justify college press freedom in light of Hazelwood.

Nevertheless, while the facts governing Hazelwood may appear to be easily distinguishable from those involving the college press, Hazelwood raises questions that are troubling. For example, might colleges now restructure their "statements of purpose" or college catalogue descriptions of student newspapers to create a "basic educational mission" for a publication in order to exercise more control over that publication? Does the incorporation of other classwork, such as an editing or reporting laboratory, create a less protected forum by making the production of the paper a "regular classroom activity"? The U.S. Supreme Court has not yet faced these questions in relationship to college publications.

Advice to Administrators

The college press system does not have to be intimidating or threatening to administrators. Some knowledge of student press structure and law will make it less ominous. Administrators should become familiar with the basic legal aspects of the student press system. And the administrator should understand his state's and the federal freedom of information acts. However, as court cases point out, the less the administrator has a hand in the operations of the college press, the better his or her legal position. Additionally, allowing the student press to operate without interference can enhance the information process and exchange of ideas at the institution.

Notes

[1] Edmund J. Sullivan. Personal interview, February 18, 1988.

[2] Sullivan.

[3] Richard Lucays. "Stop the Student Presses." Time, January 25, 1988. 54.

[4] "Hazelwood School District v Kuhlmier -- Chronology and Case Summary." The School Press Review. Fall 1987. 8.

[5] Mark Goodman. "Hazelwood School District v Kuhlmeier: What it says. What it means. Where student journalism goes from here." A paper published by the Student Press Law Center. February 10, 1988.

[6] Donald T. Kramer, J.D. "Validity, Under Federal Constitution, of Public School or State College Regulation of Student Newspapers, Magazines, or Other Publications -- Federal Cases." Regulation of Student Publications. 16 ALR Fed 182. 190.

[7] Mary Elizabeth Kurz. "The First Amendment Revisited: An Analysis of Recent Cases Re-Examining the Role of the Campus Press." A paper presented at the Ninth Annual Law and Higher Education Conference. January 17-20, 1988. 9.

[8] "The Forum Theory: One Protection for Student Journalists." Student Press Law Reporter. Spring 1987. 35.

[9] Law of the Student Press. Washington: Student Press Law Center, 1985. 15.

[10] "The Forum Theory." 37.

[11] Law of the Student Press. 17.

[12] Donald T. Kramer. 239.

[13] Law of the Student Press. 18.

[14] Donald T. Kramer. 241.

[15] Law of the Student Press. 25.

[16] Donald T. Kramer. 249.

[17] Mary Elizabeth Kurz. 2.

[18] Law of the Student Press. 54.

[19] Publication Laws Handbook. Published by the West Virginia Press Association: 1986. Part two. II-2.

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